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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISAIAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFFS' BRIEF
REGARDING THE
ADMISSIBILITY OF DR. KRIS
MOHANDIE'S TESTIMONY AT
TRIAL**

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States
3 District Court for the Central District of California. I make this Declaration in
4 Support of Plaintiffs' Brief Regarding the Admissibility of Dr. Kris Mohandie's
5 Testimony at Trial. I have personally familiar with the matters stated herein and
6 could testify competently thereto if called.

7 2. Attached hereto as "**Exhibit A**" is a true and correct copy of the email
8 chain among the parties regarding State Defendants' request for a one-day extension
9 of the initial expert disclosures.

10 3. Attached hereto as "**Exhibit B**" is a true and correct copy County
11 Defendants' January 30, 2025 Initial Expert Disclosures.


12 4. Attached hereto as "**Exhibit C**" is a true and correct copy of the
13 January 31, 2025 email sent by State Defendants with State Defendants' initial
14 expert disclosures.

15 5. Attached hereto as "**Exhibit D**" is a true and correct copy of State
16 Defendants' January 31, 2025 Initial Expert Disclosures.

17 6. Attached hereto as "**Exhibit E**" is a true and correct copy of State
18 Defendants' February 13, 2025 Rebuttal Expert Disclosures.

19 7. Attached hereto as "**Exhibit F**" is a true and correct of Dr. Kris
20 Mohandie's Rule 26 Expert Report.

21 I declare under penalty of perjury under the laws of the State of California and the
22 United States of America that the foregoing is true and correct. Executed this 19th
23 day of May 2025, in Los Angeles, California.

24
25 
26 _____
27 Hang D. Le
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